



# OFFICE OF THE SHERIFF

## COUNTY OF LOS ANGELES HALL OF JUSTICE



ALEX VILLANUEVA, SHERIFF

April 19, 2019

Akhil Gopal  
[59541-12516884@requests.muckrock.com](mailto:59541-12516884@requests.muckrock.com)

To Whom It May Concern:

This letter is in response to your request for records under the California Public Records Act received by the Los Angeles County Sheriff's Department (LASD) Discovery Unit on August 17, 2018.

In your request, you are seeking the following:

1. "The metadata of all email correspondences between the department or department members and the Anti-Defamation League (ADL) related to (with the key/search terms) the "National Counter-Terrorism Seminar" (NCTS), "Advanced Training School" (ATS), or other ADL programs that offer trainings on counter-terrorism, countering violent extremism, or homeland/national security from April 1st 2013 to August 16th, 2018 (or the day this request is submitted)"  
"We are interested in the following metadata:"
  - a) "from email address,"
  - b) "to email addresses,"
  - c) "cc email addresses,"
  - d) "bcc email addresses"
  - e) "subject line"
  - f) "titles of attached files"
  - g) "time, and date."
2. "The metadata of all email correspondences between the police department or department members and other city departments [including, but not limited to, the mayor's office, Southern California fusion centers, the Joint Regional Intelligence Center (JRJC), Orange County Intelligence and Assessment Center (OCIAC) etc.] related to the

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“National Counter-Terrorism Seminar”, “Advanced Training School”, or other ADL programs that offer training in counter-terrorism, countering violent extremism, or homeland/national security from April 1st 2013 to August 16th, 2018 (or the day this request is submitted)”

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“NOTE: E-mail metadata already exists as part of the IT infrastructure of any modern e-mail archiving or data retention system like Google, Datacove, etc. All are exportable, and should be deliverable in a CSV, excel, or other machine readable format. E-mail metadata does not include the contents of the specified e-mails, thus do not need individual review for redaction.”

3. “Any and all records regarding the monetary and logistical details for the above trainings, including but not limited to:”
  - a) “The name and title of all department members who attended the National Counter-Terrorism Seminar or at the Advanced Training School, or other such ADL programs billed as trainings on counter-terrorism”
  - b) “If participants were on paid work time, or were compensated in any way for participating”
  - c) “Any records regarding who the participants met with during the training, and regarding the process of selection of and compensation for the trainers or instructors”
  - d) “Any records of tools or metrics used to evaluate the trainings, including records of who created or provided the evaluation tools”
  - e) “Any records of logistical information regarding transportation, locations, etc. for the above trainings”
  - f) “Any records detailing any department money or other public funding that went towards this trip”
4. “Any and all records containing policies, e-mails, syllabi, notes, promotional materials, presentations, powerpoint slides and any other materials regarding the educational content of the above trainings, including but not limited to:”

- a) "The stated objectives and/or purposes for the training"
- b) "Who selected, assessed, oversaw, and approved the educational materials and/or paid for them"
- c) "Any records on what the participants were taught about Israeli counter-terrorism methods, policies, and techniques"
- d) "Any records on what the participants were taught about monitoring social media for terrorism suspects"
- e) "Any records on what the participants were taught in regards to surveillance"
- f) "A detailed list of the specific technologies involved in the trainings (software and hardware) and the names of the entities providing, installing, maintaining, and operating them where applicable."
- g) "Any records on what the participants were taught in regards to data, data collection, use of algorithms, machine learning, predictive analytics, or artificial intelligence"
- h) "Any records of what the participants were taught on crowd control tactics, including the use of lethal and non-lethal weapons (e.g. rubber bullets, tear gas, and live ammunition)."
- i) "Any records on what the participants were taught in regards to radical/extremist Islam, Muslims, radical/extremist Muslims, radical/extremist Islamist terrorism, Hamas, Islam, mosques, etc."
- j) "Statements or presentations provided by participants to the ADL, the public, or other department members regarding what they learned"

5. "Any and all records of monetary transactions, purchase agreements, purchase orders, invoices, MOUs, letters of intent, negotiations, consultation on product specifications, past or current contracts, and formal agreements between the department and the Anti-Defamation League"

**Response to request #1 and #2:** We are in the process of gathering responsive records. You will be notified once we have determined if and when the records will be available.

**Response to request #3a, #3e, and #3f:** Unfortunately, we are unable to assist you with your request. The record sought is exempt from disclosure under *Government Code* section 6254(a).

**Response to request #3b:** Your request does not ask for "identifiable" public records, but "information" in the form of interrogatories. The Public Records Act, *Government Code* section 6253(b), does not require that a public entity create a record in order to respond to a request for information. The Act only requires that certain non-exempt records already in existence be made available; it does not require the public entity to answer interrogatories.

**Response to request #3c, #3d, #4a, #4b, #4c, #4d, #4e, #4f, #4g, #4h, #4i, and #4j, and #5:** LASD has no records responsive to your request

If you have any questions, please contact Lieutenant Norman of the Discovery Unit at (323) 890-5000.

Sincerely,

ALEX VILLANUEVA, SHERIFF

A handwritten signature in black ink that reads "Kimberly L. Unland". There is a small blue mark or initial "m" positioned below and to the right of the signature.

Kimberly L. Unland, Captain  
Risk Management Bureau